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The Secretary of the Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

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AUG 12 2005

FCC - MAILROOM

Attention: Ms Marlene Dortch

August 11, 2005

Dear Ms. Dortch,

Enclosed you will find my original one page and four copies for filing of my second reply comments for MM Docket 99-325. Thank you for receiving the comments for processing.

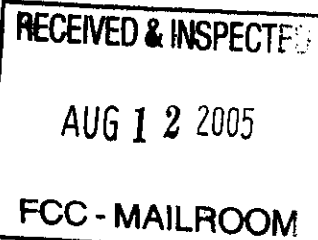
Sincerely,

*George M. Frese*

George M. Frese

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SECOND REPLY COMMENTS BY GEORGE M. FRESE, P.E.  
RADIO BROADCAST CONSULTING ENGINEER  
MM Docket 99-325 August 11, 2005



This is my third time to enter the 99-325 comment proceedings. After submitting August 8th comments, and reading some additional comments, I realized that there is something terribly wrong with the way the proceedings are going. There are really two separate issues here that seemingly have been combined into one issue, that of AM radio and FM radio. We are talking about two different standards for two different purposes. There is the proposed NRSC-5 standard for AM and the NRSC-5 for FM, two entirely different frequency band ranges and two entirely different radio wave propagation characteristics. I believe these two facilities should be considered absolutely separate from each other.

**AM and FM:** Why should distant daytime AM radio listeners who need the best local service they can get for local news, entertainment and for their emergency broadcast services be cut off, in order to add multicasting functions to FM? Some book reading services already do use FM SCA channels for this purpose, but if more multicasting services are need, let's do it on FM, not AM. Turning it the other way around, why do people far from their closest broadcast station think they need any radio service at all, if it is going to exclude the big city broadcasts from adding more services for their many listeners? But it doesn't have to be one or the other anyway. AM and FM stations service their listeners over two entirely different kinds of a facility and the rule standards need not be all wrapped up in one package.

**Nighttime:** I realize that AM nighttime has been hashed over and over again, but I have one more comment. Authorizing the AM Ibiquity system is almost guaranteed to produce serious damage to the class 1A and class 1B secondary services, which is a very important and needed service. But there are presently some very promising alternatives to significantly improve the present nighttime reception and service. Leonard Kahn Power-side will appreciably reduce nighttime fading and garble and his Cam-D is said to do even a better job than the Power-side and I have no reason to not believe that. So if we want compatible digital because it is digital, let's wait and see, without tearing up the AM nighttime reception first with Ibiquity IBOC.

**Doug Dingus:** For a very good commentary regarding AM IBOC, I would strongly recommend that everyone read the COMMENTS OF DOUG DINGUS, in the MM Docket 99-325 comments.

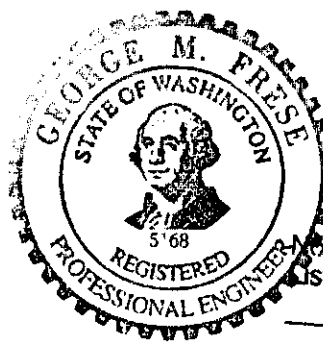
**Summary:** Why cannot the AM portion of the MM Docket 99-325 be separated completely from the FM portion so that each portion can be considered separately from each other since they are two different animals?

Respectfully Submitted

*George M. Frese, P.E.*

George M. Frese, P.E.

*Original*



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EXPIRES 6/05/06 *G.M.F.*

*August 11, 2005*